



FEDERAL ELECTION COMMISSION
Washington, DC 20463

MEMORANDUM

TO: The Commission
Staff Director
General Counsel
Press Office
Public Disclosure

FROM: Commission Secretary's Office *JS*

DATE: May 30, 2012

SUBJECT: Comments on Draft AO 2012-20
(Markwayne Mullin)

Transmitted herewith are timely submitted comments from Jason Torchinsky and Shawn Sheehy, counsel for the requestor.

Draft Advisory Opinion 2012-20 was on the May 24, 2012 open meeting agenda.

Attachment

SECRET

2012 MAY 30 A 8:51

May 29, 2012

Office of the Commission Secretary
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Re: Advisory Opinion 2012-20 (Mullin) – Draft B

Dear Commission Secretary,

These comments are in response to Draft B of Draft AO 2012-20 issued on May 29, 2012.

After reviewing the draft, we urge the Commission to adopt Draft B. This draft is consistent with the constitutional limits of the reach of the FECA, and is in accordance with the statutory framework the Commission is charged with enforcing.

We believe that under the unique facts and circumstances presented in this request, Draft B reaches the correct result.

Sincerely,



Jason Torchinsky
Shawn Sheehy
Counsel to Markwayne Mullin